PARTNERSHIP HEALTHPLAN OF CALIFORNIA

POLICY/ PROCEDURE

Policy/Procedure Number: MPQP1008 (previously QP100108 & KK Q1201)			**Lead Department: Health Services** Business Unit: Quality Improvement		
Policy/Procedure Title: Conflict of Interest Policy for QI Activities			☒ **External Policy** ☐ **Internal Policy**		
Original Date: 04/25/1994		**Next Review Date: 10/14/2027** **Last Review Date: 10/14/2026**			
Applies to:	☐ **Employees**	☒ **Medi-Cal**	☒ **Partnership Advantage**		
Reviewing Entities:	☐ **IQI**	☐ **P & T**	☐ **QUAC**		
	☐ **OPERATIONS**	☐ **EXECUTIVE**	☐ **COMPLIANCE**	☐ **DEPARTMENT**	
Approving Entities:	☐ **BOARD**	☐ **COMPLIANCE**	☐ **FINANCE**	☒ **PAC**	
	☐ **CEO** ☐ **COO**	☐ **CREDENTIALS**	☐ **DEPT. DIRECTOR/OFFICER**		
Approval Signature: *Robert Moore, MD, MPH, MBA*			**Approval Date: 10/14/2026**		

I. RELATED POLICIES:

A. CMP10 – Confidentiality
B. MPQP1053 – Peer Review Committee
C. MPQP1002 – Quality/Utilization Advisory Committee
D. MPCR200 Credentials Committee and CMO Credentialing Program Responsibilities
E. CMP21 – Conflict of Interest Code

II. IMPACTED DEPTS:

A. Health Services

III. DEFINITIONS:

N/A

IV. ATTACHMENTS:

A. Conflict of Interest Agreement

V. PURPOSE:

To describe the mechanism to ensure that a conflict of interest does not exist when contracted providers, who are members of Partnership HealthPlan of California (Partnership) committees, perform peer review or quality improvement activities.

VI. POLICY / PROCEDURE:

A. All non-Partnership persons involved in Partnership peer review activities or committees shall sign a conflict of interest statement annually. Signed statements are retained in Quality Improvement department files.
B. Conflict of interest is defined as any involvement in the care of the member involved in the review, any fiduciary interest or relationship with the provider under review, or any other involvement in the case that may impair objectivity in performing the review. Note – a provider is a broad term that could include physicians or other direct care providers and vendors.
C. Committee members or peer reviewers with a conflict of interest in a particular case will notify the Medical Director for Quality or the Committee Chair, and excuse themselves from receiving related materials and from participating in the review.
D. Should a situation arise wherein this policy is not followed, the appropriate Committee and/or its Chair will determine appropriate action and notify the individuals(s) verbally and in writing.

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VII. REFERENCES:

A. Cal. Civ. Code § 43.7 – Immunity from Liability for Peer Review Activities

VIII. DISTRIBUTION:

A. Partnership Department Directors
B. Partnership Provider Manual

IX. PERSON RESPONSIBLE FOR IMPLEMENTING PROCEDURE: Chief Medical Officer

X. REVISION DATES:

Medi-Cal
01/27/95; 10/10/97 (name change only); 12/98; 6/21/00; 05/16/01; 08/20/03; 09/15/04; 04/19/06; 04/18/07; 02/20/08; 03/18/09; 04/21/10; 08/15/12; 08/20/14; 09/16/15; 10/19/16; 11/15/17; *10/10/18; 11/13/19; 11/11/20; 11/10/21; 11/09/22; 11/08/23; 11/13/24; 08/13/25; 10/14/26

Partnership Advantage (effectiveness Jan. 1, 2028)
N/A

PREVIOUSLY APPLIED TO:

*Through 2017, Approval Date reflective of the Quality Utilization Advisory Committee meeting date. Effective January 2018, Approval Date reflects that of the Physician Advisory Committee's meeting date.

PREVIOUSLY APPLIED TO:

Partnership*Advantage*:
MPQP1008 - 04/18/2007 to 01/01/2015
Healthy Families:
MPQP1008 - 08/15/2012 to 03/01/2013 Healthy Kids: (KK QI201, MPQP1008)
04/18/07; 02/20/08; 03/18/09; 04/21/10; 08/15/12; 08/20/14; 09/16/15; 10/19/16 to 12/01/16 (Healthy Kids Program ended 12/01/2016)